

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

PRESIDENT DONALD J. TRUMP,
45th President of the United States of
America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New
York corporation, ROBERT
WOODWARD p.k.a. BOB
WOODWARD, an individual, and
PARAMOUNT GLOBAL, a Delaware
corporation f/k/a VIACOMCBS, INC.,
a Delaware corporation, f/k/a Viacom
Inc., successor by merger to
CBS Corporation, a Pennsylvania
corporation f/k/a Westinghouse Electric
Corporation,

Defendants.

Civil Action Number:
3:23-cv-02333-MCR-ZCB

**RULE 7.1 DISCLOSURE STATEMENT FOR DEFENDANT SIMON &
SCHUSTER, INC.**

Pursuant to Rule 7.1(a)(1) of the Federal Rules of Civil Procedure Defendant

Simon & Schuster, Inc. hereby states that Simon & Schuster, Inc. is an indirect, wholly-owned subsidiary of Paramount Global (f/k/a ViacomCBS Inc.). Paramount Global is a publicly traded company. National Amusements, Inc., a privately held company, beneficially owns the majority of the Class A voting stock of Paramount Global. Paramount Global is only aware, without further inquiry, that Berkshire Hathaway Inc., a publicly traded company, beneficially owns at least 10% of Paramount Global's total common stock, i.e., Class A and Class B on a combined basis, as reported on a Form 13F filed with the Securities and Exchange Commission on February 14, 2023.

Pursuant to F.R.C.P. Rule 7.1(a)(2) and 28 U.S.C. § 1332(c), Simon & Schuster is a citizen of New York.

Dated: March 24, 2023

GUNSTER, YOAKLEY & STEWART, P.A.

/s/ Kenneth B. Bell

Kenneth B. Bell (FBN 347035)
Lauren V. Purdy (FBN 93943)
1 Independent Drive, Suite 2300
Jacksonville, FL 32202
Phone: (904) 354-1980
Email: kbell@gunster.com
lpurdy@gunster.com
awinsor@gunster.com

DAVIS WRIGHT TREMAINE LLP

Elizabeth A. McNamara (NYBN 1930643)

Linda J. Steinman (NYBN 2137305)
John M. Browning (NYBN 5213038)
Leena Charlton (NYBN 5622147)
1251 Avenue of the Americas, 21st Floor
New York, NY 10020
Phone: (212) 489-8230
Email: lizmcnamara@dwt.com
lindasteinman@dwt.com
jackbrowning@dwt.com
leenacharlton@dwt.com

Attorneys for Robert Woodward, Simon & Schuster, Inc. and Paramount Global

*Pro Hac Vice Pending^{*1}*

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Kenneth B. Bell
Attorney

¹ Motions for Admission Pro Hac Vice were filed on March 23, 2023 for all counsel of record from Davis Wright Tremaine, LLP. See ECF Nos. 9-12. All counsel have completed the online tutorial and other requirements of Local Rule 11.1.